



Intercounty Electric Cooperative Association

Your Touchstone Energy® Cooperative



Date: March 7, 2014
From: Aaron Bradshaw, General Manager
To: Federal Communications Commission (FCC) Staff
Subject: Expression of Interest – Rural Trials Docket No. 10-90

Background

Intercounty Electric Cooperative Association (IECA) is a member-owned, not-for-profit electric utility formed and incorporated on December 12, 1936. The cooperative has approximately 30,000 active metered services and provides electricity to over 24,000 residential, agricultural, commercial and industrial member/consumers in parts of ten (10) counties in south central Missouri. IECA currently maintains 5,551 miles of energized line serviced from 27 substations and has a density of 5.39 meters per mile of line.

In addition to electricity, IECA also offers its members water heaters, surge protection, and energy efficiency rebates along with other services that enhance economic development and improve the quality of life for its members. In the past, the cooperative provided dial-up internet, but found it inadequate to suit the needs of members, businesses, and anchor institutions. In September of 1997, IECA established Intercounty Tele-Tech, LLC (Tele-Tech) as a wholly owned subsidiary and began to partner with Sho-Me Technology to build and expand a fiber backbone that would serve anchor institutions within the cooperative's service territory. The cooperative has constructed and currently maintains 143 miles of fiber backbone within its service territory running primarily along the U.S. 63 corridor in Texas and Phelps counties. While this project has brought much needed broadband connectivity to many community anchor institutions, due to the economics of infrastructure construction, a stark digital divide remains for the vast majority of the cooperative's members.

As an integral part of the communities it serves, IECA continually hears requests from its members that it work to help bridge the digital divide. The cooperative's members want reliable and affordable broadband service, and see IECA as the organization most likely to be able to provide it. This is in keeping with the history of electric cooperatives which, in conjunction with the Rural Electrification Administration, brought electricity to the un-served rural areas of the United States. After extensive research, IECA believes a fiber to the home (FTTH) solution is the most reliable and future proof way to provide sufficient broadband capacity and speed. IECA's member/consumers have requested robust, reliable and affordable broadband services. The cooperative is ready to step forward and provide them with this essential service.

While at this time, IECA does not have an Eligible Telecommunications Carrier (ETC) license, the cooperative will meet any applicable requirements set forth by the FCC if funding is provided.

Geographic Territory

IECA is proposing an initial pilot project to establish the scalability of FTTH before future expansion to serve its entire territory. While the cooperative serves 24,000 member/consumers in Crawford, Dent, Gasconade, Laclede, Maries, Phelps, Pulaski, Shannon, Texas, and Wright Counties the scale of the initial pilot project would be limited to an initial trial build out of two substations in Texas County serving census tract 29215480100 (<http://www.usa.com/MO215480100.html>).

This will provide access to high speed broadband for the 2667 members served from the pilot substations and would serve approximately 157 square miles. This project would represent a build out of slightly greater than 6% of the cooperative's distribution lines in an area that has a population density that averages 7.56 services per mile of line.

Please see attached maps and chart for details.

List of Anchor Institutions

Through its efforts to support the community it serves, IECA, in conjunction with its subsidiary Tele-Tech partnering with Sho-Me Technology, LLC has already managed to serve the pilot area's primary anchor institutions with a fiber connection. Current institutions that have broadband service include:

Schools: Licking R-VIII School

Libraries: Texas County Library

Government Centers: South Central Correctional Center

Health Centers/Hospitals: Mercy Clinic/Sisk Pharmacy, TCMH Clinic

The cooperative anticipates making service available to the pilot area, and eventually its entire membership, under a similar agreement between Intercounty Electric Cooperative and Tele-Tech.

Proposed technology

IECA is planning to offer FTTH services. The offerings will include voice, television, and broadband services. The initial speed offerings will start at 5 Mbps, 20 Mbps, 50 Mbps, and 100 Mbps. There are also plans to offer Gigabit services within three years to residential customers. Anchor institutions will be offered the ability to receive Gigabit connections. These service offerings are anticipated to be priced according to the tiers of service on a monthly fee of \$40 (5 Mbps), \$50 (20 Mbps), \$60 (50Mbps), and \$100 (100 Mbps).

State and/or Local Participation in and/or Support for Project

While IECA has not received any state funding to support expansion of the fiber network, the cooperative has been integral in several fiber construction projects that help provide broadband service to anchor institutions located throughout its territory.

The FTTH pilot project described in this Expression of Interest leverages the utility's rights of way and infrastructure, which reduces costs and accelerates deployment. Based on the potential benefits to the local community, the project has garnered support from many of the state and federal representatives that serve the citizens living within the cooperative's territory.

Please see the attached letters of support from the offices of:

U.S. Senator Claire McCaskill
U.S. Representative Jason Smith
Missouri Senator Mike Cunningham
Missouri Senator Dan Brown
Missouri Representative Robert Ross
Missouri Representative Tony Dugger
Missouri Representative Jeff Pogue

Existing Providers

Within the cooperative's multi-county service territory, there are a number of providers that offer internet service to a small number of IECA's member/consumers in/near more densely populated towns. Based on our relationships with our member/consumers, feedback provided indicates that only between 5% and 10% are currently being served while the vast majority of member/consumers have few, if any options.

Within the pilot region, there are two providers that overlap roughly 5% of the proposed territory. The overlapping providers are currently offering broadband from 10 Mbps (in very select areas) down to 512kbps. In most cases, however, residents are relegated to dial up, wireless, or no service whatsoever. This is clearly insufficient for today's needs, and doesn't begin to address future applications. In addition, the current providers are not able to address the needs of the area's anchor institutions by offering the required bandwidth at prices that are competitive or economically viable.

Project Timeline

IECA's proposed pilot project is shovel ready. Upon approval, make ready work can begin immediately and full construction can begin as soon as materials are received in the warehouse. Preliminary estimates indicate that the entirety of the project could be completed in twelve (12) to twenty-four (24) months from initial funding.

Scalability

The proposed pilot project uses areas served by substation as the delineation between project areas and establishes service at two substations. Based on the anticipated success of the pilot project, IECA has established a plan to provide broadband service to its remaining 27,000 service locations. Assuming the addition of a substation in the next two years, the project could be completed in five substation increments over five phases, ultimately offering broadband service to all 30,000 service locations.

Total Project Cost

The cooperative plans to utilize existing infrastructure and rights of way whenever possible to minimize the initial cost of providing the infrastructure necessary to support the pilot project. It is IECA's belief that by doing so, the project can be completed in the most economical manner. After researching the cost of materials and construction to establish a point of presence (PoP) on the fiber backbone and the distribution network required to support FTTH, the total expected cost of the proposed pilot project is \$8.5 million.

Total Utility Investment

IECA is willing to contribute its currently developed fiber backbone and locally constructed fiber valued at \$937,500 and an additional \$750,000 for a total value of \$1.7 million (20%) to support this project.

One Time Capital Infrastructure Investment Needed

Based on the anticipated cost for construction, after the in kind and capital investments by IECA, the project would require a one-time capital expenditure investment of approximately \$6.8 million to complete the infrastructure required.

Estimated Future Full Build Out Project Cost

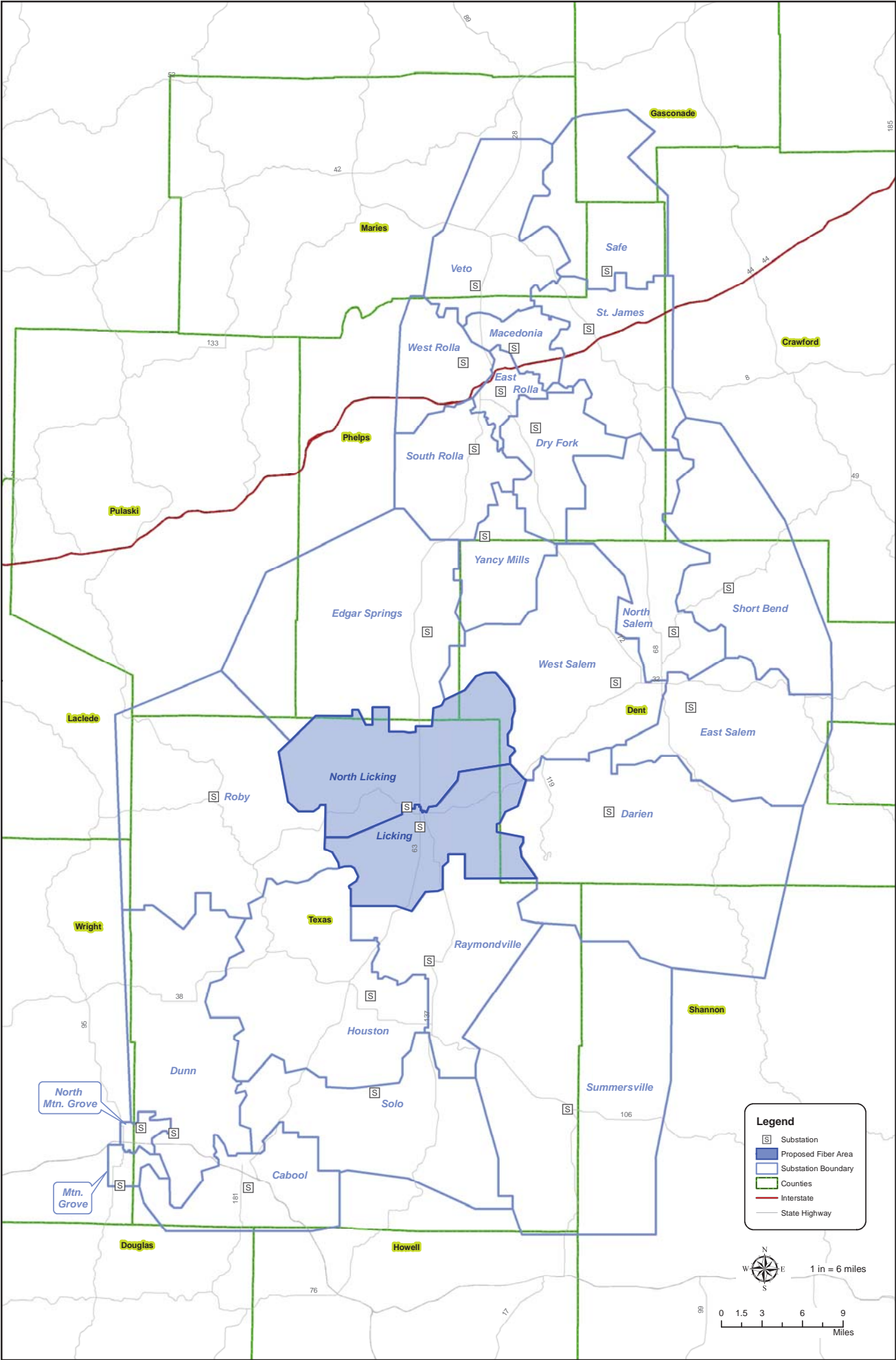
Based on current pricing of equipment, materials and labor, upon successful completion of the pilot project, IECA would plan to move forward with building FTTH for the remainder of its member/consumers. This project would require the extension of service to more than 27,000 additional meter points in an area roughly 2,530 square miles. The expected total future build out cost would be \$96.2 million. The cost per home passing would be expected to average between \$3,500 and \$4,000. With the data provided by the initial pilot project, IECA would be able to determine the percentage of total project cost it could contribute for initial construction of infrastructure and still maintain a viable organization.

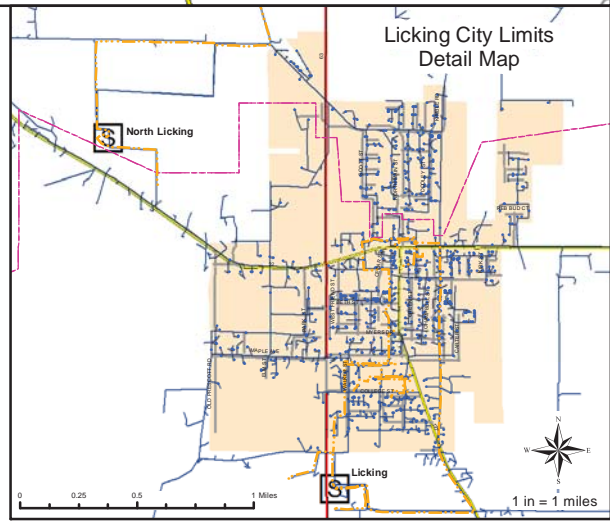
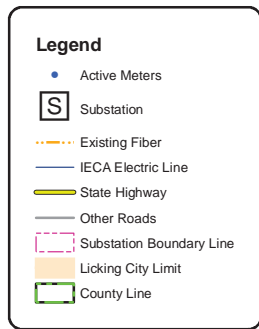
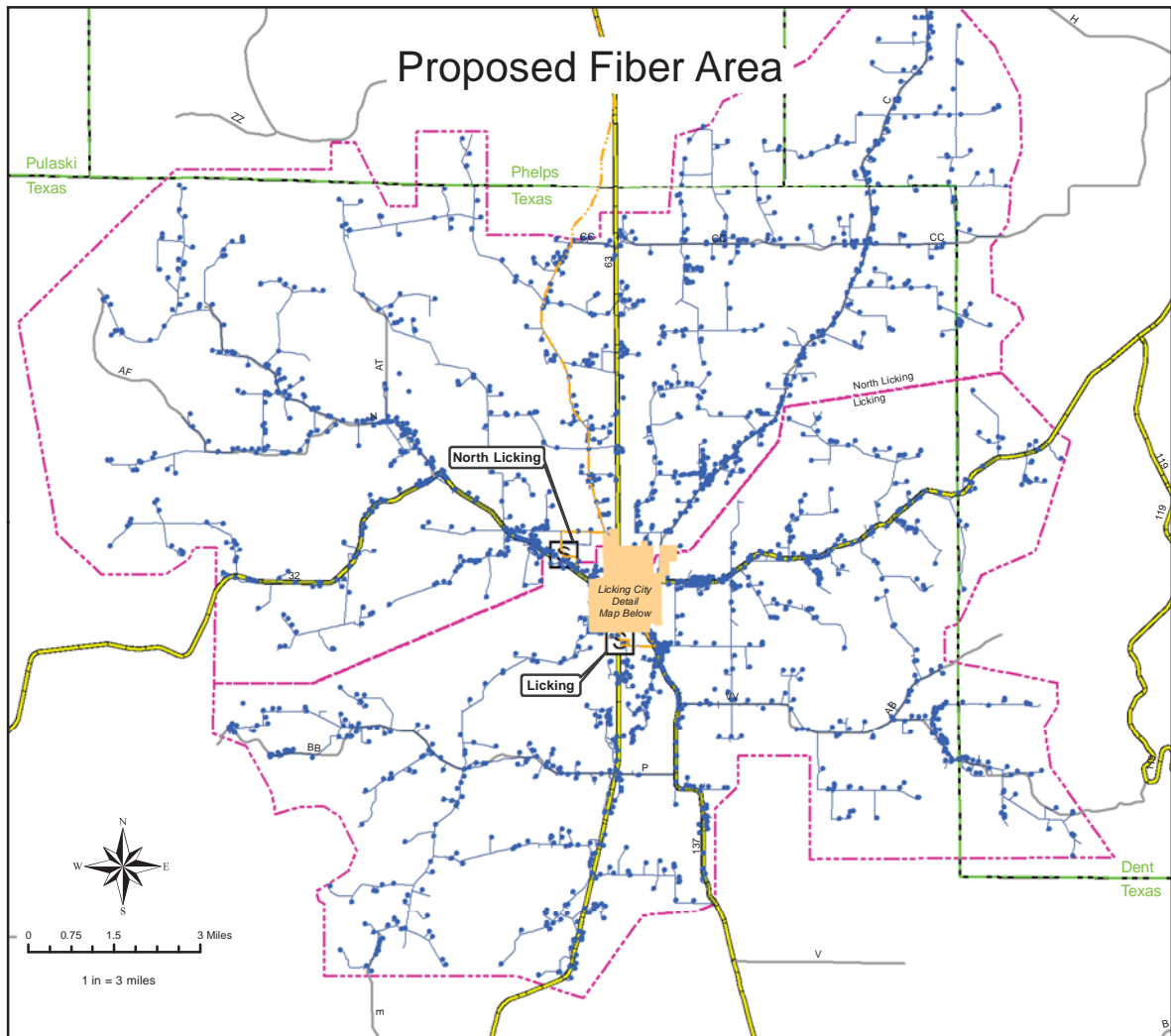
Substation	Feeder	Active Meters	Inactive Meters	Primary OH		Primary UG	
Licking	1	147	26	Pri OH	Feet	Miles	Miles
Licking	2	445	68	Pri OH	37734	7.15	5116.66
Licking	3	371	123	Pri OH	43698.56	8.28	3378.03
Licking	5	568	98	Pri OH	243081.8	46.04	4136.69
Licking	7	57	6	Pri OH	500204.3	94.74	8294.36
Licking Totals:		1588	321	Pri OH	29114.47	5.51	447.49
					853833.1	161.7	21373.2
							4.04

Substation	Feeder	Active Meters	Inactive Meters	Primary OH		Primary UG	
North Licking	1	392	77	Pri OH	Feet	Miles	Miles
North Licking	3	337	54	Pri OH	471188.4	89.24	3515.55
North Licking	5	1	0	Pri OH	116151.8	22	8556.62
North Licking	7	349	57	Pri OH	1687.31	0.32	68.69
North Licking Totals:		1079	188	Pri OH	382114.9	72.37	3622.41
					971142.3	183.9	15763.3
							2.993

Substation	Active Meters	OH Miles	UG Miles	Total Miles	Project Density
Both Subs	2667	345.65	7.033	352.683	7.562

IECA Substation Boundaries with
Proposed FTTH Pilot Project Area





CLAIRE McCASKILL
MISSOURI

COMMITTEES
ARMED SERVICES

COMMERCE, SCIENCE AND
TRANSPORTATION

HOMELAND SECURITY
AND GOVERNMENTAL AFFAIRS

SPECIAL COMMITTEE ON AGING

AD HOC SUBCOMMITTEE
ON CONTRACTING OVERSIGHT
CHAIRMAN

United States Senate

WASHINGTON, DC 20510

March 6, 2014

Chairman Tom Wheeler
445 12th St SW
Washington, DC 20554-0004

Dear Chairman Wheeler,

I am writing to express my support for the Intercounty Electric Cooperative Association's (IECA) expression of interest in the Federal Communications Commission's Connect America Cost Model. Their proposal is entitled the Rural Fiber to the Home (FTTH) Pilot Project.

In conjunction with the Rural Electrification Administration, the IECA has historically brought electricity to un-served rural areas in the United States. As a trusted local utility, the IECA now repeatedly receives requests for reliable and affordable broadband services from its members. In accordance with its mission and its role in the rural community it serves, IECA wishes to step up and provide their members with the services they are requesting.

After extensive research, the IECA believes a FTTH solution is the most reliable way to provide sufficient broadband capacity and speed. IECA is proposing an initial pilot project to establish the scalability of FTTH before future expansions to serve its entire service area. The scale of the initial pilot project would be limited to an initial trial build out of two substations in Texas County serving a census block. This project is designed to provide high-speed broadband for the 2667 members served from the pilot substations and covering roughly 157 square miles. This project would represent a build out of roughly 6% of the cooperative's distribution lines in an area that has a population density that averages 7.56 homes per mile of line.

Thank you in advance for your full and fair consideration of this application. Please keep me apprised of the progress of their application.

Sincerely,



Claire McCaskill
United States Senator

IN REPLY PLEASE REFER TO
OFFICE INDICATED:

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FAX: (573) 442-7140

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FAX: (816) 421-2562

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SUITE A
☐ ST. LOUIS, MO 63112
(314) 367-1364
FAX: (314) 361-8649

324 PARK CENTRAL WEST
SUITE 101
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<http://mccaskill.senate.gov>

JASON SMITH
8TH DISTRICT, MISSOURI

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THE JUDICIARY**

COURTS, INTELLECTUAL PROPERTY AND
THE INTERNET SUBCOMMITTEE

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AND ANTITRUST LAW SUBCOMMITTEE

CONSTITUTION AND CIVIL JUSTICE
SUBCOMMITTEE

**COMMITTEE ON
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PUBLIC LANDS AND ENVIRONMENTAL
REGULATION SUBCOMMITTEE

FISHERIES, WILDLIFE, OCEANS AND
INSULAR AFFAIRS SUBCOMMITTEE

Congress of the United States
House of Representatives
Washington, DC 20515-2508

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CAPE GIRARDEAU, MO 63703
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FARMINGTON OFFICE
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FARMINGTON, MO 63640
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ROLLA OFFICE
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ROLLA, MO 65401
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WEST PLAINS OFFICE
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WEST PLAINS, MO 65775
(417) 255-1515—PHONE

<http://www.jasonsmith.house.gov>

February 24, 2014

Chairman Tom Wheeler
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Dear Chairman Wheeler:

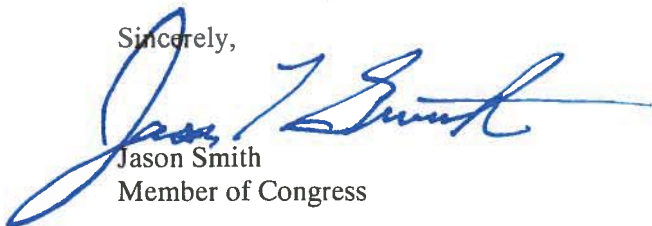
It is my understanding the Federal Communications Commission has selected electric cooperatives as one of the groups to participate in the service based experiments designed to review alternatives for delivering robust broadband to rural America. I am writing in support of the Intercounty Electric Cooperative Association's proposed Fiber to the Home (FTTH) pilot project.

Electric cooperatives have a long tradition of providing utility services to rural America, which are areas that provide little or no return on investment. As such, IECA is the ideal vehicle for a pilot project to establish the feasibility of making rural FTTH a reality. The cooperative brings both hard assets and experience to the project. IECA is able to leverage its easements and infrastructure to reduce overall cost. The cooperative's existing infrastructure and experience with fiber construction should accelerate deployment.

In addition to providing the FCC with the data it needs to make future decisions about universal connectivity, this type of project clearly benefits the type of rural communities served by IECA and other electric cooperatives in a number of ways. Without access to broadband, the nation's rural residents and businesses are hamstrung in a world where business and education are increasingly conducted online. With access to high-speed broadband, both industry and schools compete on a level playing field. Lastly, rural broadband has the ability to improve disaster response and the provision of emergency services for these communities.

This project will offer a roadmap for providing service to those residents in rural America that are woefully underserved. IECA is a reliable, stable, established pillar in rural Missouri with a long history of supporting its communities and is the ideal vehicle for bringing broadband to these homes and businesses. I offer my full support of IECA's efforts to bridge the digital divide.

Sincerely,



Jason Smith
Member of Congress

CAPITOL OFFICE:

STATE CAPITOL, ROOM 331
JEFFERSON CITY, MO 65101
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FAX (573) 526-4716
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COMMITTEES:

VICE-CHAIR, FINANCIAL AND GOVERNMENTAL
ORGANIZATIONS AND ELECTIONS
COMMERCE, CONSUMER PROTECTION,
ENERGY AND THE ENVIRONMENT
GOVERNMENTAL ACCOUNTABILITY AND
FISCAL OVERSIGHT
VETERANS' AFFAIRS AND HEALTH

MISSOURI SENATE
JEFFERSON CITY

MIKE CUNNINGHAM
33RD DISTRICT

February 26, 2014

Mr. Tom Wheeler, Chairman
Federal Communications Commission
445 12th St SW,
District of Columbia, 20536

Mr. Wheeler:

It is my understanding that the Federal Communications Commission (FCC) has wisely selected electric cooperatives as one of the groups to participate in the service based experiments designed to review alternatives for delivering robust broadband to rural America. I'm writing in support of Intercounty Electric Cooperative Association's (IECA) proposed fiber to the home (FTTH) pilot project.

Electric cooperatives have a long tradition of providing utility services in areas that provide little or no return on investment, i.e., rural America. As such, IECA is the ideal vehicle for a pilot project to establish the feasibility of making rural FTTH a reality. The cooperative brings both hard assets and experience to the project. IECA is able to leverage its rights of way and infrastructure to reduce overall project cost. The project is shovel ready and the cooperative's existing infrastructure combined with the cooperative's experience with fiber construction should accelerate deployment.

In addition to providing the FCC with the data it needs to make future decisions about universal connectivity, this type of project clearly benefits the type of rural communities served by IECA and other electric cooperatives in a number of ways. Without access to broadband, the nation's rural residents and businesses are hamstrung in a world where business and education are increasingly conducted online. With access to high-speed broadband, both industry and children compete on a level playing field. Finally, rural broadband has the ability to improve disaster response and the provision of emergency services for these communities in the future.

Tom Wheeler
February 26, 2014
Page Two

It is my hope that this project can help provide a roadmap for providing service to those citizens in rural America that are currently woefully underserved. IECA is a reliable, stable, long established pillar in rural Missouri and has a long history of supporting their communities. The need for rural broadband is a reality and IECA is the ideal vehicle for bringing it to the homes and businesses of these rural communities. Please join me in supporting Intercounty Electric Cooperative's efforts to bridge the digital divide.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Cunningham". The signature is fluid and cursive, with the first name "Mike" being more prominent and the last name "Cunningham" written in a more compact, flowing style.

Mike Cunningham
State Senator, District 33

DAN. BROWN
16TH DISTRICT

STATE CAPITOL, ROOM 419
JEFFERSON CITY, MO 65101
PHONE: 573-751-5713
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WWW.SENATE.MO.GOV/BROWN



MISSOURI SENATE
JEFFERSON CITY

COMMITTEES:
AGRICULTURE, FOOD PRODUCTION AND
OUTDOOR RESOURCES
APPROPRIATIONS
EDUCATION
VETERANS' AFFAIRS AND HEALTH, CHAIRMAN

February 27, 2014

Mr. Tom Wheeler, Chairman
Federal Communications Commission
445 12th St SW
Washington, DC 20554

Dear Mr. Wheeler:

It is my understanding that the FCC has wisely selected electric cooperatives as one of the groups to participate in the service based experiments designed to review alternatives for delivering robust broadband to rural America. I'm writing in support of Intercounty Electric Cooperative Association's proposed fiber to the home (FTTH) pilot project.

Electric cooperatives have a long tradition of providing utility services in areas that provide little or no return on investment (i.e. rural America). As such, IECA is the ideal vehicle for a pilot project to establish the feasibility of making rural FTTH a reality. The cooperative brings both hard assets and experience to the project. IECA is able to leverage its rights of way and infrastructure to reduce overall project cost. The project is shovel ready and the cooperative's existing infrastructure combined with the cooperative's experience with fiber construction should accelerate deployment.

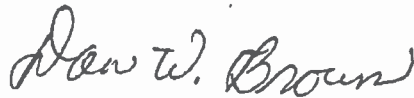
In addition to providing the FCC with the data it needs to make future decisions about universal connectivity, this type of project clearly benefits the type of rural communities served by IECA and other electric cooperatives in a number of ways. Without access to broadband, the nation's rural residents and businesses are hamstrung in a world where business and education are increasingly conducted online. With access to high-speed broadband, both industry and children compete on a level playing field. Lastly, rural broadband has the ability to improve disaster

February 27, 2014
Mr. Tom Wheeler, Chairman
Page 2

response and the provision of emergency services for these communities in the future.

It is my hope that this project can help provide a roadmap for providing service to those citizens in rural America that are currently woefully underserved. IECA is a reliable, stable, long established pillar in rural Missouri and has a long history of supporting their communities. The need for rural broadband is a reality and IECA is the ideal vehicle for bringing it to the homes and businesses of these rural communities. Please join me in supporting Intercounty Electric Cooperative's efforts to bridge the digital divide.

Sincerely,

A handwritten signature in cursive script that reads "Dan W. Brown".

DAN W. BROWN
STATE SENATOR, 16TH DISTRICT

CAPITOL OFFICE

State Capitol
201 West Capitol Avenue
Room 114 A
Jefferson City, MO 65101-6806
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E-Mail: robert.ross@house.mo.gov

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Joint Committee on Capital Improvements and
Leases Oversight

MISSOURI HOUSE OF REPRESENTATIVES**ROBERT ROSS**

State Representative
District 142

February 24, 2014

Federal Communications Commission (FCC) Staff:

Please accept this letter in support of the efforts of Intercounty Electric Cooperative Association (IECA) to initiate a fiber to the home (FTTH) pilot project. I have been impressed on numerous occasions by IECA's outstanding service and dedication to the people of the rural communities in my area, and for that reason I am confident they would make an ideal partner to expand broadband to those who need it.

As we both know, electric cooperatives have a long tradition of providing utility services in areas that are otherwise underserved, and I firmly believe IECA is the ideal vehicle for a pilot project to establish the feasibility of making rural FTTH a reality. The cooperative possesses the experience and assets necessary to make this project a success, in leveraging the existing rights-of-way and infrastructure which will result in an overall reduction in total project cost and accelerated deployment.

In addition to providing the FCC with the data it needs to make future decisions about universal connectivity, this type of project clearly benefits the type of rural communities served by IECA and other electric cooperatives in a number of ways. Without access to broadband, the nation's rural residents and businesses are hamstrung in a world where business and education are increasingly conducted online. With access to high-speed broadband, both industry and children compete on a level playing field. Lastly, rural broadband has the ability to improve disaster response and the provision of emergency services for these communities in the future.

It is my hope that this project can help provide a roadmap for providing service to those citizens in rural America who are currently woefully underserved. IECA is a reliable, stable, long-established pillar in rural Missouri and has a long history of supporting their communities. The need for rural broadband is a reality and IECA is the ideal vehicle for bringing it to the homes and businesses of these rural communities.

I ask you to please provide the support necessary to help Intercounty Electric Cooperative bridge the digital divide.

Working on your behalf,

A handwritten signature in blue ink, appearing to read "Robert Ross", is written over a horizontal line.

Representative Robert Ross

Proudly Serving the 142nd House District
Texas, Howell, Phelps, & Pulaski Counties
Missouri House of Representatives

CAPITOL OFFICE
State Capitol- Room 300
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DISTRICT ADDRESS
P.O. Box 275
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Tele: (417) 746-4650



MISSOURI HOUSE OF REPRESENTATIVES

Tony Dugger

State Representative
District 141

February 28, 2014

COMMITTEES

Chairman:
Financial Institutions

Member:
Agriculture Policy
Utilities

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

To Whom It May Concern:

It is my understanding that the Federal Communications Commission has wisely selected electric cooperatives as one of the groups to participate in the service based experiments designed to review alternatives for delivering reliable broadband access to rural America. I'm writing in support of Intercounty Electric Cooperative Association's proposed fiber to the home (FTTH) pilot project.

Electric cooperatives have a long tradition of providing utility services in areas that provide little or no return on investment, especially rural America. As such, IECA is the ideal vehicle for a pilot project to establish the feasibility of making rural FTTH a reality. The cooperative brings both hard assets and experience to the project. IECA is able to leverage its rights of way and infrastructure to reduce overall project cost. The project is shovel-ready and the cooperative's existing infrastructure combined with the cooperative's experience with fiber construction should accelerate deployment.

In addition to providing the FCC with the data it needs to make future decisions about universal connectivity, this type of project clearly benefits the type of rural communities served by IECA and other electric cooperatives in a number of ways. Without access to broadband, the nation's rural residents and businesses are stymied in a world where business and education are increasingly conducted online. With access to high-speed broadband, both industries and children alike can compete on a level playing field. Lastly, rural broadband has the ability to improve disaster response and the emergency services for these communities in the future.

It is my hope that this project can help provide a roadmap for providing service to those citizens in rural America that are currently woefully underserved. IECA is a reliable, stable, long established pillar in rural Missouri and has a long history of supporting their communities. The need for rural broadband is a reality and IECA is the ideal vehicle for bringing it to the homes and businesses of these rural communities. Please join me in supporting Intercounty Electric Cooperative's efforts to bridge the digital divide.

Sincerely,

A handwritten signature in black ink that reads "Tony Dugger". The script is cursive and fluid, with the first letters of "Tony" and "Dugger" being capitalized and prominent.

Tony Dugger
141st District

CAPITOL OFFICE
State Capitol
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Jefferson City, MO 65101-6806
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E-Mail:
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COMMITTEES
Appropriations-
General Administration
Financial Institutions
Urban Issues

MISSOURI HOUSE OF REPRESENTATIVES

Jeff Pogue

State Representative
District 143

February 24, 2014

Federal Communications Commission (FCC) Staff:

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Grace & Peace,

A handwritten signature in black ink, appearing to read "J Pogue", is written over a horizontal line.

State Representative, District 143